

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re:)	Chapter 11
)	
CFO MANAGEMENT HOLDINGS, LLC, <i>et al.</i> ¹)	Case No. 19-40426
)	
Debtors.)	(Jointly Administered)
)	
)	

**CPIF LENDING, LLC'S WITNESS AND EXHIBIT LIST
FOR HEARING ON APRIL 2, 2019**

CPIF Lending LLC, party-in-interest and creditor (“CPIF”), designates the exhibits and witnesses set forth below that may be used in connection with the above-referenced bankruptcy cases for the following matters set to be heard on April 2, 2019 at 2:30 p.m. (CT):

- *Debtors' Motion Pursuant to 11 U.S.C. Sections 105(a) and 363 to (I) Employ and Retain SierraConstellation Partners, LLC and (II) Designate Lawrence R. Perkins as Chief Restructuring Officer, Effective as of the Petition Date* [Doc. No. 11];
- *Application of Debtors for an Order Authorizing the Employment of Winstead PC as Counsel for the Debtors, Effective as of the Petition Date* [Doc. No. 32];
- *Motion of CPIF Lending, LLC for Appointment of a Chapter 11 Trustee* [Doc. No. 59];
- *Expedited Motion for Debtors for Interim and Final Orders: (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service; (II) Deeming the Utility Companies Adequately Assured of Future Performance; and (III) Establishing Procedures for Determining Request for Additional Adequate Assurance* [Doc. No. 69]; and
- *United States Trustee's Motion to Appoint Chapter 11 Trustee* [Doc. No. 103].

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Carter Family Office, LLC (1652); CFO Management Holdings, LLC (6987); Christian Custom Homes, LLC (4648); Double Doptine Ranch, LLC (7134); Frisco Wade Crossing Development Partners, LLC, (4000); Kingswood Development Partners, LLC (1929); McKinney Executive Suites at Crescent Parc Development Partners, LLC (2042); North-Forty Development LLC (5532); and West Main Station Development, LLC (7210).

CPIF WITNESSES

1. Lawrence Perkins,
2. Joseph Wielebinski,
3. Any witness called or designated by any other party in interest; and
4. Any witness necessary to rebut the testimony of witnesses called or designated by any other party.

CPIF EXHIBITS

NO.	DESCRIPTION	OFFER	OBJ	ADMIT DATE	NOT/AD DATE
A.	Company Agreement of CFO Management Holdings, LLC				
B.	Action by Written Consent of the Sole Members of the Companies Listed on Schedule I, dated Jan. 16, 2019				
C.	Promissory Note dated February 13, 2019 in favor of Christian Custom Holmes LLC in the original principal face amount of \$1,250,000.00				
D.	Deed of Trust and Security Agreement in favor of Christian Custom Holmes LLC dated February 13, 2019				
E.	Debtors' Motion Pursuant to 11 U.S.C. Sections 105(a) and 363 to (I) Employ and Retain SierraConstellation Partners, LLC and (II) Designate Lawrence R. Perkins as Chief Restructuring Officer, Effective as of the Petition Date [Doc. No. 11] (without exhibits)				
F.	Declaration of Lawrence R. Perkins in Support of Debtors' Motion Pursuant to 11 U.S.C. Sections 105(a) and 363 to (I) Employ and Retain SierraConstellation Partners, LLC and (II) Designate Lawrence R. Perkins as Chief Restructuring Officer, Effective as of the Petition Date [Ex. B to Doc. No. 11]				

NO.	DESCRIPTION	OFFER	OBJ	ADMIT DATE	NOT/AD DATE
G.	Terms of Engagement of SierraConstellation Partners LLC to provide Lawrence R. Perkins as Chief Restructuring Officer and CRO Support Personnel (with Standard Terms and Conditions) [Ex. C to Doc. No. 11]				
H.	Application of Debtors for an Order Authorizing the Employment of Winstead PC as Counsel for the Debtors, Effective as of the Petition Date [Doc. No. 32] (without exhibits)				
I.	Declaration of Joseph J. Wielebinski in Support of Application of Debtors for an Order Authorizing the Employment of Winstead PC as Counsel for the Debtors, Effective as of the Petition Date [Ex. A to Doc. No. 32]				
J.	Draft DIP Budget 2-20-2019				
K.	Action by Written Consent of the Sole Members of the Companies Listed on Schedule I dated March 26, 2019				
L.	Letter of March 26, 2019 from E. Leonard to J. Wielebinski				
M.	Any exhibits designated by any other party				
N.	Any exhibits necessary for rebuttal, impeachment or refreshing the recollection of witnesses				
O.	Any additional exhibits used for demonstrative purposes only				
P.	Any motion or pleading filed of record				

CPIF incorporates in the Exhibit List the pleadings and other papers filed in these bankruptcy cases, and other court filings, as permitted by the rules and applicable authority, including Federal Rules of Evidence Rule 201. CPIF further reserves the right to introduce or rely upon any exhibit designated by any party and to introduce any exhibit, document, or information to rebut or impeach any statement or testimony.

Dated: March 28, 2019

Respectfully submitted,

/s/ Jason B. Binford

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Jason B. Binford (TX 24045499)

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-and-

Michael J. Barrie (DE # 4684), *pro hac vice* application pending

Jennifer R. Hoover (DE # 5111), *pro hac vice* application pending

Kevin M. Capuzzi (DE # 5462)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 28, 2019, a true and correct copy of the foregoing document was served electronically by the Court's electronic filing notification system and on the parties listed below via e-mail. Further, pursuant to Local Bankruptcy Rule 9014-1(d), copies of the foregoing exhibits were provided to the parties listed below via e-mail.

/s/*Jason B. Binford*
Jason B. Binford

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